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DEPARTMENT OF NATURAL RESOURCES  
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DOG  
MINERALS PROGRAM  
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DIVISION OF  
OIL GAS & MINING

April 23, 1991

Mr. Lowell Braxton, Administrator  
Natural Resources Department  
Utah Division of Oil, Gas & Mining  
3 Triad Center, Suite 350  
Salt Lake City, Utah 84180-1203

Dear Mr. Braxton:

Thank you for the opportunity to comment on the Reclamation Plan Final Report for the Escalante Unit Mine. Through past correspondence with your office we have expressed our specific concerns regarding the reclamation of the Escalante Unit (see letter of Feb. 15, 1990). Although we are pleased to see several of our comments addressed in the Final Report, we are very concerned about those issues not resolved. They are as follows:

1. Topsoil

We feel that four inches of topsoil over 14 inches of waste rock is not adequate substrate for plant persistence and maintenance at this site. Although the subsoil has been increased by 7 inches, we still maintain that one foot of topsoil over two feet of waste rock is necessary for proper re-vegetative growths.

Following sloping, the complete area should be ripped 2-4 feet deep to allow mix of topsoil and rock. Ripping would break up compacted soil catchment basins, increase water filtration and holding capacity, improve rooting and create a proper environment for germination, establishment and reproduction of plant species.

2. Plants

Specifics for transplanting are still not mentioned in the reclamation plan. Transplanting should be done in the spring following direct seeding. Transplanted shrubs should be planted 435 stems/acre, or one shrub for every ten feet. To account for mortality, one shrub every five feet would be most effective.

Mr. Lowell Braxton, Administrator  
April 24, 1991  
Page 2

3. Fencing

On page 20 of the Reclamation Plan, under structures and equipment, it states that the fence will be permanently removed when Hecla and DOGM agree that self-sustaining vegetative cover is established. This should be a time period of at least 3-5 years. Once the fence is removed, precautions should be taken to ensure the area is not damaged by livestock grazing, since the area will probably have better quality and quantity forage than adjoining areas. A BLM standard livestock fence should be installed to allow safe passage for wildlife and keep grazing under control.

Currently, reclamation is far behind schedule and the area poses a potential urban and wildlife hazard. The UDW strongly encourages the DOGM to use its enforcement authority to ensure timely and proper reclamation of this site. If you have any questions regarding our comments, please feel free to contact this office.

Sincerely,

F. Clair Jensen  
Regional Supervisor

FCJ/vt